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10 *Attorney for Plaintiff*

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12 **UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

13 CHAMPERY RENTAL REO, LLC, a  
14 California Limited Liability Company

Civil No. 3:19-CV-00529-MMD-CLB

15 Plaintiff(s),  
16 v.  
**STIPULATION TO DISMISS WELLS**  
**FARGO BANK, N.A. WITHOUT**  
**PREJUDICE**

17 ADAM W. POLSON, an individual;  
18 INTERNAL REVENUE SERVICE; WELLS  
FARGO BANK, N.A.; All other persons  
19 unknown claiming any right, title, estate, lien  
or interest in the real property described in the  
20 complaint adverse to Plaintiff's ownership, or  
any cloud upon Plaintiff's title thereto; DOES  
21 and ROES I through X, inclusive;

22 Defendant(s).

23

24 **AND RELATED ACTIONS.**

25

26 Plaintiff/Counter-Defendant Champery Rental REO, LLC ("Champery"),  
27 Defendant/Counter-Plaintiff/Third-Party Plaintiff Adam W. Polson ("Polson"), Defendant  
28 Internal Revenue Service ("United States"), Defendant Wells Fargo Bank, N.A. ("Wells Fargo"),

1 and Third-Party Defendant Renovista Ridge Master Property Owners Association (“Renovista”)  
2 (collectively, the “Parties”), by and through their respective attorneys of record, hereby stipulate  
3 as follows:

4           **IT IS HEREBY STIPULATED AND AGREED** that Champery’s claims against Wells  
5 Fargo in this case are dismissed without prejudice.

6           **IT IS FURTHER STIPULATED AND AGREED** that Champery will not seek recovery  
7 of its attorneys’ fees and costs in this case from Wells Fargo.

8           **IT IS FURTHER STIPULATED AND AGREED** that Wells Fargo will not seek recovery  
9 of its attorneys’ fees and costs in this case from Champery.

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1 Respectfully submitted this 21<sup>st</sup> day of January 2020.

2 HUTCHISON & STEFFEN, PLLC

3 /s/ Matthew K. Schriever

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15 /s/ Michael Lehners

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24 RICHARD E. ZUCKERMAN  
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25 /s/ Boris Kukso

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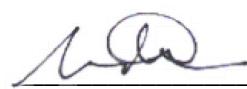
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28 /s/ Eva G. Segerblom

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29 **ORDER**

30 IT IS SO ORDERED:



31 UNITED STATES DISTRICT JUDGE

32 DATED: January 22, 2020